

**IN THE UNITED STATES DISTRICT  
COURT FOR THE EASTERN  
DISTRICT OF VIRGINIA  
Norfolk Division**

**SDC, INC.,**

**Plaintiff,**

**v.**

**Case No. 2:23cv418**

**OASIS POOLS AND HARDSCAPES,  
LLC**

**SAVVAS SAKKADAS,  
INDIVIDUALLY  
WILLIAM HENRY, INC.**

**D/B/A  
TIDAL WAVE GRAPHICS**

**Defendants.**

**CONSENT MOTION TO EXTEND RESPONSIVE  
PLEADING DEADLINE**

COME NOW Defendants Oasis Pools and Hardscapes, LLC and Savvas Sakkadas, individually, (hereinafter “Defendants”), by counsel, with the consent of Plaintiff and pursuant to Fed. R. Civ. P. 6(b)(1)(A), and hereby respectfully request an extension of time to file pleadings in response to Plaintiff’s Complaint [ECF No. 1] to November 3, 2023.

Defendants state as follows in support of this Motion:

1. Plaintiff filed his Complaint on August 24, 2023. [ECF No. 1]. Pursuant to Fed. R. Civ. P. 15 (a)(3), Defendants’ responsive pleadings are due on September 19, 2023.

2. Rule 6(b) permits the Court to extend time for good cause if the request is made within the time to act.

3. An extension will permit Counsel for Defendants sufficient time to

investigate the allegations as asserted in the Complaint in order to file responsive pleadings on behalf of Defendants.

4. Counsel for Plaintiff consents to Defendants' motion. Specifically, on September 13, 2023, counsel for Plaintiff consented to an extension of time for Defendants to file responsive pleadings until November 3, 2023.

5. Accordingly, no prejudice to the parties will result from extending the deadline for Defendants to file responsive pleadings.

6. Furthermore, no prejudice will befall the Court in extending the Defendants' deadline to file responsive pleadings, as no scheduling order has been entered in this matter, and the case is in its early stages and as of the date of this Motion.

7. Good cause exists to extend the time to file responsive pleadings to November 3, 2023. Defendants are diligently participating in this lawsuit and this request is not intended for any purpose of delay. Further, an extension will permit undersigned counsel the opportunity to investigate the allegations set forth in the Complaint, and to meaningfully confer with interested parties.

8. This motion is not made for the purpose of delay or any other improper purpose.

A proposed Order is attached as **Exhibit 1** to this motion.

WHEREFORE, Oasis Pools and Hardscapes, LLC and Savvas Sakkadas, individually, respectfully request the Court to extend their deadline to file responsive pleadings to Plaintiff's Complaint to November 3, 2023, and for all further relief the Court deems just and proper.

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/s/

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*Counsel for Oasis Pools and Hardscapes, LLC, and  
Savvas Sakkadas, individually*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of September, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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\_\_\_\_\_  
/s/

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